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September 20, 2012

BY FACSIMILE

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
500 Pearl Street, Room 920
New York, NY 10007

MEMO ENDORSED**The Application is granted.****SO ORDERED:**

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: *Sept 21, 2012*

Re: Robert Bagley v. JPMorgan Chase & Co.
10 Civ. No. 1592 (PGG)(RLE)

Dear Judge Gardephe:

We represent the plaintiff Robert Bagley in the above-captioned matter. We respectfully write to request a brief extension of the deadline for submission of trial memoranda only. Pursuant to the Court's Order dated July 20, 2012, the parties' pre-trial submissions are due September 24, 2012 and trial would begin on November 5, 2012. Pursuant to Your Honor's Individual Rules, as part of the pre-trial submissions the parties are required to file trial memoranda of law addressing each issue of law that the parties expect to arise at or before trial. Plaintiff respectfully requests that the Court extend the deadline for submission of the trial memoranda of law one week, from September 24, 2012 to October 1, 2012.

Defendant does not oppose this request. No other deadlines would be affected if this request were granted. The parties would submit their proposed joint pre-trial order, jury instructions, voir dire, verdict sheet, and motions in limine by September 24, 2012. In addition, the parties would be ready for trial on November 5, 2012.

Respectfully submitted,

Milt Williams Jr.
Milton L. Williams, Jr.

MLW:ji

cc: Robert S. Whitman, Esq. (by email)
Stacey L. Blecher, Esq. (by email)

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